

UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA,	*
Plaintiff	*
	*
	*
v.	*
	CASE NO.: 1:14-cr-00021-JL
	*
LEONARDO ALMONTE-RAMIREZ,	*
Defendant	*
	*

MOTION TO WITHDRAW

Now comes defense counsel in the above-captioned matter, William R. Sullivan, Jr., and requests this Honorable Court allow his withdrawal from the above-entitled matter.

As reasons for this request, defense counsel states the following:

1. There has been a breakdown in attorney-client communication to the extent that counsel can no longer effectively represent the Defendant in this matter.
2. On or about August 19, 2014 defense counsel entered his appearance for the Defendant after several weeks of negotiation with Defendant's family as to payment of the fees necessary for the litigation process for the Defendant.
3. Defense counsel reached agreement with the Defendant as well as his family regarding payment of fees to defense counsel to represent the Defendant at trial in this matter.
4. As a sign of good faith, defense counsel accepted payment of a partial retainer from the Defendant's family, with the intention that the balance would be paid in full prior to the disposition of this matter.
5. Since reaching an agreement with the Defendant and his family, defense counsel

has received no further payments from the Defendant's family despite repeated requests to the Defendant and his family directly.

6. Defense counsel believes this is a breach of the agreement he entered into in good-faith and that he cannot continue to represent the Defendant under these conditions without being compensated.
7. Prior to the breakdown in communication, defense counsel had received several promises from Defendant and his family that funds were forthcoming on each occasion that defense counsel spoke to them.
8. At this point, defense counsel has no faith that monies will be paid to support the representation of the Defendant in the case at hand and given the fact that the Defendant has filed a Motion for defense counsel to withdraw from this matter, defense counsel believes the breakdown is irretrievable.

Wherefore, defense counsel respectfully requests that this Honorable Court allow his withdrawal from this matter.

Date: November 21, 2014

Respectfully submitted,
Defendant,
By his attorney,

/s/ William R. Sullivan, Jr.
William R. Sullivan, Jr.
SULLIVAN & SULLIVAN
25 Railroad Square, Suite 405
Haverhill, MA 01832
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CERTIFICATE OF SERVICE

I, William R. Sullivan, Jr., do hereby certify that the above Motion to Withdraw has, on this 21st day of November, 2014, been served on all parties or their attorneys of record via electronic filing.

/s/ William R. Sullivan, Jr.
William R. Sullivan, Jr.